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June 24, 2020

VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: Iturbide, et al. v. Cho Familia Dynastia, Inc. d/b/a Flor De Mayo, et al.
S.D.N.Y. Civil Docket No. 17-CV-00596 (SN)

Dear Magistrate Judge Netburn:

As the Court is aware, this firm represents Defendants in the above-referenced matter. We write on behalf of Defendants and the Plaintiffs (collectively, "the Parties"), to jointly provide a status update in accordance with the Court's Memo Endorsement dated April 29, 2020 (DKT 112), and to request a continued stay of discovery for a time period of 30 days.

The Parties have continued to engage in settlement discussions and have discussed the same by teleconference. However, as discussed in the parties' prior application to the Court (DKT 111), Defendants' hospitality business has been severely affected by the COVID-19 outbreak, thus creating an impediment to effective settlement negotiations.¹ Nevertheless, the Parties have continued to endeavor to resolve this matter, and Defendants recently proposed a revised settlement offer in light of the circumstances. Defendants currently are awaiting Plaintiffs' response. As such, and given the continued burdens imposed by the COVID-19 outbreak, the Parties request an additional thirty-day stay of discovery, until July 24, 2020. The proposed stay of discovery would provide counsel for Plaintiffs additional time to discuss Defendants' most recent settlement proposal with their clients. The Parties will, of course, keep the Court apprised of any developments regarding settlement of this matter.

Respectfully submitted,


/s/ Paul R. Piccigallo

Paul R. Piccigallo

The stay of discovery is extended to July 24, 2020. By that date, the parties shall file a stipulation of settlement or status letter regarding settlement of this case.

SO ORDERED

Dated: June 26, 2020
New York, New York


SARAH NETBURN
United States Magistrate Judge